

STERN KILCULLEN & RUFOLO, LLC

COUNSELORS AT LAW

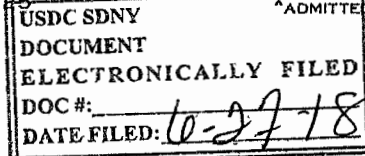
HERBERT J. STERN*
KEVIN M. KILCULLEN*
PASQUALE J. RUFOLO
JOEL M. SILVERSTEIN*
MARK W. RUFOLO*
MICHAEL DINGER*
BRIAN J. DEBOER*
JOHN E. TRAVERS*
LINDA A. ELFENBEIN
CORINNE M. MAROTTA

325 COLUMBIA TURNPIKE
SUITE 110, P.O. BOX 992
FLORHAM PARK, NEW JERSEY 07932-0992
TEL.: 973-535-1900 • FAX: 973-535-9664

214 BRAZILIAN AVENUE
SUITE 200
PALM BEACH, FLORIDA 33480
TEL.: 561-721-6585

MEMO ENDORSED

*ADMITTED IN NJ AND FL
*ADMITTED IN NJ AND NY
*ADMITTED IN NJ, NY, PA AND FL



June 27, 2018

VIA ECF

The Honorable Lewis A. Kaplan
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Chevron Corp. v. Donziger, et al.*, Case No. 11 Civ. 0691 (LAK)

Dear Judge Kaplan:

I respectfully write as co-counsel for Chevron to inquire whether, consistent with Your Honor's practice at the underlying trial of this matter, we may at the June 28, 2018 evidentiary hearing (a) enter into evidence as the direct testimony of Lee Grinberg his March 5, 2018 Declaration (with exhibits) (previously filed herein as Document 1967-2 on March 19, 2018) and (b) have Mr. Grinberg in court that day and available for any cross-examination by Mr. Donziger.

Respectfully,

/s/ Herbert J. Stern

Herbert J. Stern

cc: All Counsel of Record (via ECF)

*The direct examination
shall be addressed orally.*

SO ORDERED

[Signature]
LEWIS A. KAPLAN, USDJ

6/27/18